IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PFIZER INC., PFIZER IRELAND)
PHARMACEUTICALS, WARNER-)
LAMBERT COMPANY, WARNER-)
LAMBERT COMPANY, LLC and)
WARNER-LAMBERT EXPORT LTD)
) C. A. No. 08-164-JJF
Plaintiffs,	
v.) \
v -	/ \ /
RANBAXY LABORATORIES LIMITED,) REDACTED VERSION
RANBAXY PHARMACEUTICALS, INC.	,
and RANBAXY INC)
and this in the	,
Defendants	,)
)
)

DECLARATION OF JAY R. DESHMUKH, ESQ., IN SUPPORT OF RANBAXY'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT

Of Counsel
Darrell L Olson
Douglas G. Muehlhauser
William R. Zimmerman
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DATED: April 24, 2008

Frederick L. Cottrell, III (#2555)
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RICHARDS LAYTON & FINGER, P.A.
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Wilmington, DE 19899
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Attorneys for Defendants
Ranbaxy Laboratories Limited,
Ranbaxy Pharmaceuticals Inc.
and Ranbaxy Inc

I, Jay R. Deshmukh, Esq., declare as follows:

I am currently Senior Vice President, Global Intellectual Property, for Ranbaxy Laboratories Limited ("Ranbaxy"). I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently and completely to the statements made herein.

2. Ranbaxy filed Abbreviated New Drug Application ("ANDA") Nos. 76-477 and 78-747 seeking approval to market generic versions of the drug products Lipitor[®] and Caduet[®], respectively. The drug products of Ranbaxy ANDA Nos. 76-477 and 78-747 both contain atorvastatin calcium

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3.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and accurate to the best of my knowledge.

Executed this 23rd day of April, 2008, in Princeton, New Jersey.

Jay R. Deshmukh, Esq.

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UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 1, 2008, I electronically filed the foregoing with the Clerk of Court using CM/ECF and caused the same to be served on the plaintiff at the addresses and in the manner indicated below:

HAND DELIVERY

Rudolf E. Hutz Jeffrey B. Bove Mary W. Bourke Connolly Bove Lodge & Hutz LLP The Nemours Building 1007 North Orange Street P.O. Box 2207 Wilmington, DE 19899-2207 (302) 658-9141

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